



## FARMERS COOPERATIVE

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Received 8:00am - 8:00am

August 10, 2011

AUG 16 2011

FCC Mail Room

Marlene H Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Room TW-A325  
Washington, DC 20554

Re: LightSquared Subsidiary LLC Request for Modification of its Authority for an Ancillary Terrestrial Component, IBFS File No. SAT-MOD-20101118-00239; IB Docket No. 11-109

Dear Ms. Dortch:

Thank you for this opportunity to offer reply comments concerning the interference report submitted by the Technical Working Group and LightSquared's new plan and recommendations. Farmers Cooperative, a farmer owned cooperative with 6000 stockholders in Nebraska, uses Global Positioning Systems (GPS) technology on a daily basis. We are concerned that LightSquared's proposed network will cause unacceptable interference to GPS use for precision agricultural practices and other needs. We urge the Federal Communications Commission (FCC) not to permit LightSquared to proceed with its wireless network until testing demonstrates clearly that no interference to GPS will occur.

Precision agriculture constitutes an enormously successful innovation for farmers and is possible because of the reliable and wide availability of GPS technology. GPS technology enables farmers to save money on input costs and helps maximize yields. GPS technology also helps farmers optimize benefits to the environment, through better soil and water management, and through lower use of fertilizer, pesticides and other crop applications.

If our members were to lose reliable access to GPS technology, they would lose these benefits. As a result, they would suffer higher input costs, earn lower revenue, and face more difficult environmental management conditions. Though we generally support the pursuit of wireless broadband services, such expansion must not result in the degradation or loss of GPS technology. The cost to production agriculture from the loss of GPS would simply be too great.

It is our understanding that the details of LightSquared's proposal have been in flux, partly perhaps as a result of the interference already demonstrated by the testing that has been conducted so far. We

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suggest that LightSquared conduct more testing on the precise deployment plans currently under consideration. Unfortunately, the testing already conducted appears to confirm fears that LightSquared's transmissions would cause significant interference and thus pose an unacceptable risk to precision agricultural practices.

Until more testing has been conducted to demonstrate that no interference would occur to the GPS signals needed for precision agriculture, we urge the FCC not to permit deployment of LightSquared's proposed service. Farmers have invested a substantial amount of money in GPS technology, and use of the technology has become an essential part of their business operations. If additional testing demonstrates continued interference, the FCC should work with LightSquared to locate appropriate spectrum outside of the L-band for LightSquared's proposed wireless network.

Thank you for the opportunity to share our views.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ronald Velder". The signature is fluid and cursive, with the first name "Ronald" being more prominent than the last name "Velder".

Ronald Velder

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